

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOES #1 – 5 and MARY DOE,

Plaintiffs,

Case No. 2:12-cv-11194

v.

HON. ROBERT H. CLELAND

RICHARD SNYDER, Governor of the State
of Michigan, and COL. KRISTE
ETUE, Director of the Michigan State
Police, in their official capacities,

MAG. JUDGE DAVID R. GRAND

Defendants.

**STIPULATION AND ORDER REGARDING
PLAINTIFFS' MOTION TO COMPEL ACCESS TO
MICHIGAN STATE POLICE TRAINING ON SEX OFFENDER
REGISTRATION DATA MANAGEMENT SYSTEM**

The parties, by and through counsel, have resolved the issues raised in Plaintiffs' Motion to Compel Access to Michigan State Police Training on Sex Offender Registration Data Management System, as follows:

1. Defendants will videotape the training session to be held on December 10, 2013 in Lansing or the training session to be held on December 12, 2013 in Warren. The videotape will be a complete and accurate copy of the entire training session. All presenters shall be both video and audio recorded. Audience questions may be recorded by audio only, if the Defendants prefer. Defendants will ensure, through the use of portable microphones or similar technology, that questions from the audience are audibly recorded.

2. If the training session covers sensitive law enforcement information that Defendants believe should not be disclosed to the public, Defendants may flag that information,

and provide it to Plaintiffs' counsel subject to a protective order, agreed upon by the parties, that prohibits further disclosure. If the training session covers information the Defendants believe is so sensitive that it cannot be released at all, even under a protective order, Defendants may redact such information, but must provide a privilege log to Plaintiffs' counsel identifying what information has been redacted and the basis for the redaction. Plaintiffs may challenge any redactions they deem improper.

3. The videotape of the training session shall be provided to Plaintiffs no later than one week after conclusion of the training session.

SO ORDERED.

Dated: December 6, 2013

/s/Robert H. Cleland
Hon. Robert H. Cleland
U.S. District Judge

Stipulated and approved for entry:

/s Miriam Aukerman
Miriam Aukerman (P63165)
American Civil Liberties Union
Fund of Michigan
Attorney for Plaintiffs

/s Erik Grill
Erik Grill (P64713)
Assistant Attorney General
Attorney for Defendants